UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MOHAMMED ABDUL AL KOKABANI, a/k/a "Isaac," and ADEL MOHSIN, a/k/a "Hafa,"

Defendants.

07 CF. 39 4



#### COUNT ONE

The Grand Jury charges:

- 1. On or about May 16, 2006, in the Southern District of New York and elsewhere, MOHAMMED ABDUL AL KOKABANI, a/k/a "Isaac," and ADEL MOHSIN, a/k/a "Hafa," the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 473.
- 2. It was a part and an object of the conspiracy that MOHAMMED ABDUL AL KOKABANI, a/k/a "Isaac," and ADEL MOHSIN, a/k/a "Hafa," the defendants, and others known and unknown, unlawfully, willfully, and knowingly, would and did buy, sell, exchange, transfer, receive, and deliver false, forged, counterfeited and altered obligations and other securities of the United States, with the intent that the same be passed, published, and used as true and genuine, in violation of Title 18, United States Code, Section 473.

## OVERT ACTS

- 3. In furtherance of the conspiracy and to effect the illegal object thereof, MOHAMMED ABDUL AL KOKABANI, a/k/a "Isaac," and ADEL MOHSIN, a/k/a "Hafa," the defendants, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:
- a. On or about May 16, 2006, KOKABANI met another individual (the "Buyer") at 670 Castle Hill Road, Bronx, New York, and accepted \$2,700 in genuine United States currency for the purpose of exchanging that genuine currency for \$4,000 in counterfeit United States currency.
- b. On or about May 16, 2006, MOHSIN delivered \$4,000 in counterfeit United States currency to the Buyer at 670 Castle Hill Road, Bronx, New York.

(Title 18, United States Code, Section 371.)

## COUNT TWO

4. On or about May 16, 2006, in the Southern District of New York and elsewhere, MOHAMMED ABDUL AL KOKABANI, a/k/a "Isaac," and ADEL MOHSIN, a/k/a "Hafa," the defendants, unlawfully, willfully, and knowingly, did buy, sell, exchange, transfer, receive, and deliver false, forged, counterfeited and altered obligations and other securities of the United States, with the intent that the same be passed, published, and used as true and genuine, to wit, KOKABANI and MOHSIN sold approximately \$4,000 in counterfeit United States currency to another

individual.

(Title 18, United States Code, Sections 473 and 2.)

## FORFEITURE ALLEGATION

5. As the result of committing the counterfeiting offenses alleged in Counts One and Two of this Indictment,
MOHAMMED ABDUL AL KOKABANI, a/k/a "Isaac," and ADEL MOHSIN, a/k/a "Hafa," the defendants, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting or derived from proceeds obtained directly or indirectly as a result of the offenses, including but not limited to a sum of money of at least \$4,000 representing the proceeds obtained as a result of the offenses, for which the defendants are jointly and severally liable.

## Substitute Assets

- 6. If any forfeitable property, as a result of any act or omission of the defendants -
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other

property which cannot be divided
without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

(Title 18, United States Code, Sections 371, 473, and 982.)

/FOREPERSON

MICHAEL J. CARCIA

United States Attorney

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Defendants.

#### INDICTMENT

07 Cr.

(18 U.S.C. §§ 371, 473, and 2.)

MICHAEL J. GARCIA United States Attorney.

A TRUE BILL

the 5/8/67 Filed undertwent. Case assigned to Judge Sand.

- Francis, J.